

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

BETHAN FAULKNER,  
Plaintiff,

v.

LUCILE PACKARD SALTER  
CHILDREN'S HOSPITAL,  
Defendant.

Case No. 21-cv-00780-SI

**VERDICT FORM**

1 We answer the questions submitted to us as follows:  
2

3     **1. Did Beth Faulkner prove by a preponderance of the evidence that  
4 her presentation of a complaint or report about unsafe patient care,  
5 services, or conditions at LPCH, to LPCH or its medical staff, was a  
6 substantial motivating reason for her discharge?**

7                         \_\_\_\_\_**Yes** \_\_\_\_\_ **No**  
8

9 If your answer to question 1 is yes, then answer question 2. If you answered  
10 no, stop here, answer no further questions, and have the presiding juror sign  
11 and date this form.  
12

13     **2. Did LPCH prove by a preponderance of the evidence that Beth  
14 Faulkner's inadequate job performance was also a substantial motivating  
15 reason for LPCH's discharge?**

16                         \_\_\_\_\_**Yes** \_\_\_\_\_ **No**  
17

18 If your answer to question 2 is yes, then answer question 3. If you answered  
19 no, skip question 3 and answer question 4.  
20

21     **3. Would LPCH have discharged Beth Faulkner anyway at that time  
22 based on inadequate job performance had LPCH not also been  
23 substantially motivated by retaliation?**

24                         \_\_\_\_\_**Yes** \_\_\_\_\_ **No**  
25

26 If your answer to question 3 is no, then answer question 4. If you answered  
27 yes, stop here, answer no further questions, and have the presiding juror sign  
28 and date this form.  
29

United States District Court  
Northern District of California

**4. Did Beth Faulkner prove by a preponderance of the evidence that the discharge caused her harm?**

Yes                  No

If your answer to question 4 is yes, then answer questions 5 and 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

## **5. What are Beth Faulkner's damages?**

a. noneconomic loss, including mental suffering, emotional distress: \$ \_\_\_\_\_

b. economic loss \$

**TOTAL      \$**

6. Did Beth Faulkner prove by clear and convincing evidence that, in terminating Beth Faulkner, conduct constituting malice, oppression, or fraud was committed by one or more officers, directors, or managing agents of LPCH?

**Yes** **No**

Please have the presiding juror sign and date this form.

**Signed:** \_\_\_\_\_  
*Presiding Juror*

Dated:

After this verdict form been signed, notify the clerk that you are ready to present your verdict in the courtroom.

# PUNITIVE DAMAGE VERDICT

We answer the questions submitted to us as follows:

**1. What amount of punitive damages, if any, do you award Beth Faulkner?**

**TOTAL**      \$\_\_\_\_\_

Please have the presiding juror sign and date this form.

Signed: \_\_\_\_\_  
*Presiding Juror*

**Dated:**

After this verdict form been signed, notify the clerk that you are ready to present your verdict in the courtroom.